

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

In Re

NAJEEB AHMED KHAN,

Debtor.

Case No: 19-04258 (SWD)
Chapter 11

NOTICE OF AGENDA OF MATTERS
SCHEDULED FOR HEARING ON JANUARY 3, 2020 AT 11:00 A.M. (ET)

UNCONTESTED MATTERS

1. Chapter 11 Trustee's Motion for Entry of an Order Approving Procedures for the Sale or Abandonment of Miscellaneous Assets and Granting Related Relief (**Docket No. 276**)

Related Documents:

- A. None.

Response Deadline: December 24, 2019 at 4:00 p.m. (*prevailing* Eastern Time)

Responses Received:

- A. Informal comment from the Official Committee of Unsecured Creditors, requesting the objection deadline to any Miscellaneous Sale Notice be increased from 5 to 7 days.
- B. Informal comment from Elizabeth Von Eitzen, counsel for Nancy Khan, requesting Nancy Khan be added as a Notice Party with regards to service of any Miscellaneous Sale Notices.

Status: *The hearing on this matter is going forward. The Chapter 11 Trustee has revised the proposed order to incorporate the informal comments.*

2. Chapter 11 Trustee's Second Motion for Authority to Permit Payment of Reasonable Living Expenses of Debtor from Social Security Payments and Individual Retirement Account (**Docket No. 296**)

Related Documents:

- A. Order Granting Chapter 11 Trustee's Motion for Authority to Permit Payment of Reasonable Living Expenses of Debtor from

Social Security Payments and Individual Retirement Account
(Docket No. 222)

Response Deadline: December 31, 2019 at 4:00 p.m. (*prevailing* Eastern Time)

Responses Received:

- A. None.

Status: *The hearing on this matter is going forward.*

3. Chapter 11 Trustee's Application Pursuant to Fed. R. Bankr. P. 2014(a) for an Order Under Section 327(a) of the Bankruptcy Code Authorizing the Employment and Retention of Douglas G. Smith, SRA, AI-RRS as Appraiser **(Docket No. 299)**

Related Documents:

- A. None.

Response Deadline: January 2, 2020 at 4:00 p.m. (*prevailing* Eastern Time)

Responses Received:

- A. None as of the filing of this Agenda.

Status: *The hearing on this matter is going forward.*

4. Motion of the Chapter 11 Trustee to (I) Sell Vehicle Collection Free and Clear of Liens, Claims, Encumbrances and Interests and Outside the Ordinary Course of Business Pursuant to 11 U.S.C. § 363; (II) Approve Terms and Conditions of Agreement with RM Sotheby's; and (III) Grant Related Relief **(Docket No. 300)**

Related Documents:

- A. None.

Response Deadline: January 2, 2020 at 4:00 p.m. (*prevailing* Eastern Time)

Responses Received:

- A. Informal comments from KeyBank, National Association ("KeyBank"), requesting that the proposed order (i) include KeyBank as a consultation party with respect to certain potential decisions related to the vehicle auction, (ii) requiring the auction house to hold sale proceeds in trust pending distribution to the estate, and (iii) requiring a subsequent motion and hearing for certain potential post-auction actions.

- B. Informal comments from Nancy Khan, requesting that the proposed order (i) include Nancy Khan as a consultation party with respect to certain potential decisions related to the vehicle auction; (ii) include specific language requiring an escrow of sale proceeds; and (iii) prohibit credit bidding at the auction.

Status: *The hearing on this matter is going forward. The Chapter 11 Trustee has revised the proposed order to incorporate the informal comments.*

5. Chapter 11 Trustee's Application to Employ and Approve the Compensation of RM Sotheby's as Sales Agent and Auctioneer for the Debtor's Vehicle Collection (**Docket No. 301**)

Related Documents:

- A. None.

Response Deadline: January 2, 2020 at 4:00 p.m. (*prevailing Eastern Time*)

Responses Received:

- A. None as of the filing of this Agenda.

Status: *The hearing on this matter is going forward.*

Dated: January 2, 2020

Respectfully submitted,

MARK IAMMARTINO, Chapter 11 Trustee

/s/ Nicholas M. Miller _____

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- and -

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CERTIFICATE OF SERVICE

Nicholas M. Miller hereby certifies that on January 2, 2020, he caused a true and correct copy of the ***Notice of Agenda of Matters Scheduled for Hearing on January 3, 2020*** to be filed electronically with the Clerk of the court using the CM/ECF system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties listed on the electronic filing receipt. Parties may access this filing through the Court's system.

Additionally, on January 2, 2020, I caused the parties listed below to be served a copy of the foregoing via U.S. First Class Mail:

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| Najeeb Ahmed Khan PO Box 360 Granger, IN 46530 | Internal Revenue Service PO Box 7346 Philadelphia, PA 19101-7346 |
| Internal Revenue Service Insolvency PO Box 330500, Stop 15 Detroit, MI 48226 | Michigan Secretary of State Michigan Secretary of State Building Lansing, MI 48917 |
| Michigan Department of Treasury Lansing, MI 48922 | Securities and Exchange Commission 100 F Street, NE Washington, DC 20549 |

/s/ Nicholas M. Miller

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